

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-20168-ALTONAGA

UNITED STATES OF AMERICA

v.

REGINALD LOUIS CHOSSON,

Defendant.

FACTUAL PROFFER

The United States and the Defendant, Reginald Chosson (the “Defendant”), stipulate that if this case were to proceed to trial, the United States would prove the following facts, among others, beyond a reasonable doubt:

1. On May 2, 2022, the Defendant purchased a PTR 91 .308 caliber rifle (Serial No. GI22265) (“Firearm 1”) on gunbroker.com. The Defendant picked up Firearm 1 from Lucky Pawn & Jewelry, 10207 Northwest 7th Avenue, Miami, Florida on May 7, 2022.

2. On May 12, 2022, the Defendant purchased a PTR 91 .308 caliber rifle (Serial No. GI20162) (“Firearm 2”) on gunbroker.com. The Defendant picked up Firearm 2 from Lucky Pawn & Jewelry, 10207 Northwest 7th Avenue, Miami, Florida on May 17, 2022.

3. On May 31, 2022, the Defendant completed a series of four payments to purchase a Barrett .50 caliber BMG M107A1 semi-automatic rifle (Serial No. AE008918) (“Firearm 3”) on gunbroker.com. On June 5, 2022, the Defendant picked up Firearm 3 from Lucky Pawn & Jewelry, 10207 Northwest 7th Avenue, Miami, Florida.

4. On Form 4473 for Firearm 1, Firearm 2, and Firearm 3, the Defendant answered “yes” when asked “Are you the actual transferee/buyer of the firearm(s) listed on this form and

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any continuation sheet(s) . . .?” At the time the Defendant answered “yes” for Firearm 1, Firearm 2, and Firearm 3, he knew that answer to be a false statement:

5. The Defendant purchased Firearm 1, Firearm 2, and Firearm 3 at the direction of co-conspirator and co-defendant Samuel PIERRE. At the time he purchased Firearm 1, Firearm 2, and Firearm 3, the Defendant intended to sell all three firearms to PIERRE.

6. The Defendant delivered all three firearms to co-conspirator and co-defendant Joseph Jules PLANCHER and knew that the firearms would be shipped to Haiti.

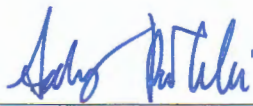
7. Lucky Pawn & Jewelry, located at 10207 Northwest 7th Avenue, Miami, Florida, is a Federal Firearms Licensee.

The United States and the Defendant agree that these facts, which do not include all of the facts known to the United States and to the Defendant, are sufficient to prove the guilt of the Defendant as to the crime of Conspiracy, in violation of Title 18, United States Code, Section 371 (Count 1) and Purchase of Firearms by Means of a False Statement, in violation of Title 18, United States Code, Section 922(a)(6) (Counts 2 and 3).

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

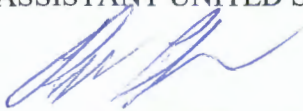
Date: 12/10/24

By:


AUDREY PENCE TOMANELLI
ASSISTANT UNITED STATES ATTORNEY


Date: 12/10/24

By:


PETER S. HELLER
ATTORNEY FOR DEFENDANT

Date: 12/10/24

By:


REGINALD LOUIS CHOSSON
DEFENDANT